

FILED

MAR 17 1998

AT 8:30
WILLIAM T. WALSH
CLERK

AUGUST W. FISCHER, ESQ.
53 Pequot Rd.
Ringwood, NJ 07456
(973)962-7179

Attorney for Defendant
Richard Calanni

WALSH SECURITIES, INC. <div style="text-align: right;">Plaintiff,</div>	:	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY
-vs-	:	CIVIL ACTION NO.: CV973496 (WJB)
CRISTO PROPERTY MANAGEMENT LTD., et als.	:	AFFIDAVIT IN SUPPORT OF MOTION
Defendant,	:	

Richard Calanni, being of full age, deposes and says as follows:

1. I am the defendant in the above entitled action and am familiar with the facts recited herein.
2. Prior to my being served with process in the pending case or served with a copy of the complaint, I was served with a subpoena issued by the office of the United States Attorney requiring that I deliver and turn over unto the Federal Bureau of Investigation all of my records and documents in connection with appraisals done by me covering any properties on which mortgages were issued by Walsh Securities, Inc. I complied as fully as

possible with this directive. I do not know the total number of appraisals which I turned over to the United States Attorneys Office, but I am aware that they exceeded sixty (60).

3. After the scheduling conference was held before this Court I was advised by my attorney, August W. Fischer, Esq., that, in order to comply with Rule 26 I should make available copies of all these same documents at the depositories fixed by the Court Scheduling Order.

4. I have endeavored, through the office of my attorney, August W. Fischer, to obtain a return of the subpoenaed documents but have been advised they will not be released by the U.S. Attorney. Upon information and belief, Mark Farley, Esq. repeated this position at the scheduling conference.

5. I have been advised that a photocopy will be made available to me if I will pay the cost thereof.

6. I have now been advised the cost of procuring one photocopy of each of the documents which are my property, but currently being held by the U.S. Attorney, will be approximately \$1,500.00.

7. Ever since this action began and because of extremely bad press reports in the area newspapers disparaging my professional ability and indicating that my professional work was now the subject of both criminal and civil action, my business has been almost entirely destroyed.

8. In order to make a living I am currently working six (6) or seven (7) days each week, substantially more than eight (8) hours each day, as a limousine driver.

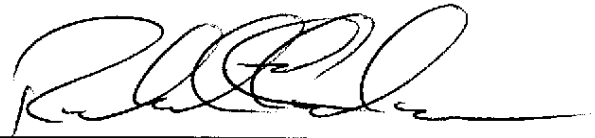
9. My wife is currently working cleaning houses in our neighborhood.

10. Together both of our current incomes merely provide us with a minimal income barely permitting us to exist and pay current bills.

11. I believe it would be a grave injustice to require me to pay \$1,500.00 to the United States Attorneys Office, or a printer chosen by them, to copy all of the documents which are truly mine. I freely provided them many months ago when requested and should be entitled to a return of the documents, or at least a copy thereof with out any cost.

12. I do not currently have \$1,500.00 and, thus, face a potential contempt of court problem according to my attorney. I place my dilemma before the Court.

Date:



RICHARD CALANNI

Sworn to and Subscribed before me
this 14th day of March, 1998



JOANN FARRUGIA
MY COMMISSION EXPIRES ON 6/19/01